

PLEA PACKET MEMO

ASSIGNED AUSA: Megan Eyes

DEFENDANT: HERIVERTO RAMIREZ

CASE# B-22-1147-S1

RECOMMENDATION IN EXCHANGE FOR DEFENDANT'S PLEA TO COUNT THREE AND WAIVER OF CERTAIN APPELLATE RIGHTS: ACCEPTANCE OF RESPONSIBILITY, LOW END OF THE ADVISORY GUIDELINES, AND DISMISSAL OF REMAINING COUNTS AT TIME OF SENTENCING.

FACT SUMMARY SHEET

Agents with Homeland Security Investigations began surveillance of a suspected stashhouse for narcotics at 2817 Frankfurt Street, Brownsville, Cameron County, Texas. On December 6, 2022, agents watched Defendant HERIVERTO RAMIREZ exit his house carrying a brown box and place it in his red Chevrolet Silverado parked in his driveway at 2817 Frankfurt Street. Shortly after leaving his house, Cameron County Sheriff's Office conducted a traffic stop on Defendant's Chevrolet Silverado. During a consensual search of the truck agents located the brown box in the rear passenger side labeled for shipping, a Cameron County Sheriff's Office canine alerted to the presence of narcotics in the brown box. With Defendant's consent, agents opened the box and found 494 grams of fentanyl concealed inside the shell of a tankless hot water heater.

During the execution of a search warrant of 2817 Frankfurt Street agents located 8.84 kilograms of cocaine and 1247 grams of fentanyl hidden in the bottom of a dresser. Defendant knowingly possessed both narcotics with the intent to distribute them to another person within the United States.


I agree the above factual summary accurately represents my involvement in the crime to which I am pleading guilty and that the abbreviated proposed plea agreement accurately describes my plea agreement with the government. A complete written plea agreement may be attached.



Defendant



Counsel for Defendant



Assistant United States Attorney